



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5**

**230 SOUTH DEARBORN ST.**

**CHICAGO, ILLINOIS 60604**

REPLY TO THE ATTENTION OF:

19 SEP 1989

US EPA RECORDS CENTER REGION 5



436409

**MEMORANDUM**

Subject: Comments on PRP Search Report - Revere Copper & Brass Site

From: Thomas J. Kenney  
Assistant Regional Counsel

To: Lisa Smith

The Office of Regional Counsel appreciates the opportunity to comment on the above-referenced PRP Search report. The Office has the following comments concerning this report:

General Comments - What is the status of the title search requested? The report hinges on the information it will provide and the report is not complete without it.

Page 1 - 1.0 Introduction - There is a distinction between the removal that was planned based on the TAT report and the emergency removal which took place based on the disposal of drums and capacitors. The introduction should mention this aspect of the site history. Also, the Office of Regional Counsel requested that an investigator be assigned to investigate who might be responsible for the disposal which prompted the emergency removal. The Office of Criminal Investigation should be contacted to see if it conducted an investigation.

2.1 Revere Copper - What is the status of Revereware? Is it a viable corporation? What is its exact relationship to Revere Copper & Brass?

Page 2 - 2.2 City of Detroit Community Economic Development Dept. My understanding is that the City of Detroit acquired the property as a result of Revere Copper & Brass's failure to pay property taxes.

2.4 Other PRPs - The Criminal Investigation Unit should be contacted to determine if it obtained any information concerning the incident that led to the emergency removal. Did the scope of work for the PRP search include investigation into the sources of the transformers at the site? If it did, the contractor should have made efforts to obtain that information.